

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EUGENE WESTMORELAND, Individually and)
for a class,)
)
Plaintiff,) Case No. 1: 23-cv-01851
)
vs.)
)
THOMAS DART, SHERIFF OF COOK COUNTY,)
and COOK COUNTY, ILLINOIS,)
)
Defendants.)

DEFENDANTS RULE 26(a)(2)(B) DISCLOSURES

NOW COME Defendants, Cook County, and Thomas J. Dart, (collectively “Defendants”), by and through their attorneys, DeVore Radunsky LLC, and pursuant to Fed. R. Civ. P. 26(a)(2)(B) and consistent with FRE 702, 703 and 705 make the following disclosures:

DISCLOSURES

Rule 26(a)(2)(B)

- (i) A complete statement of all opinions the witness will express and the basis and reason for them;

ANSWER: **See attached Globetrotters Report dated April 1, 2024**

- (ii) The facts or data considered by the witness in forming them;

ANSWER:

Mr. Darr's opinions are based on the records and depositions noted in his attached report as well as his experience, training and expertise in the field of architecture

- (iii) Any exhibits that will be used to summarize or support them;

ANSWER: **Mr. Darr may use demonstrative evidence or other exhibits noted in his report.**

- (iv) The witness's qualifications, including a list of all publications authored in the previous 10 years;

ANSWER: **Mr. Darr's CV is attached.**

- (v) A list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition; and

ANSWER: **See attached list.**

- (vi) A statement of the compensation to be paid for the study and testimony in the case.

ANSWER: **Invoice for services will provided upon receipt.**

Respectfully submitted,

/s/ Troy S. Radunsky
One of the Attorneys for Defendants

Jason DeVore (ARDC: 6242782)
Troy Radunsky (ARDC: 6269281)
DeVore Radunsky LLC
230 W. Monroe, Suite 230
Chicago, IL 60606

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the above **Defendants' Rule 26(a)(2)(B) Disclosures** were served on plaintiff's counsel listed below via email on April 1, 2024.

/s/ Troy S. Radunsky
Troy S. Radunsky, One of the
Attorneys for Defendants

Service List

Thomas G. Morrissey Ltd.,
10257 S. Western Ave. Chicago, IL 60643
773 233 7900

Thomas Morrissey – tgm@morrisseylawchicago.com
Patrick Morrissey – pwm@morrisseylawchicago.com